

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NIKKO D’AMBROSIO,	)	
Plaintiff,	)	
v.	)	Case No. 24 – cv – 678
	)	
META PLATFORMS, INC., <i>et al.</i> ,	)	Hon. Sunil R. Harjani
Defendants.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANTS’ MOTIONS TO DISMISS SECOND AMENDED  
COMPLAINT AND LEAVE TO FILE HIS RESPONSES TO DEFENDANTS’ MOTIONS  
TO DISMISS IN EXCESS OF THE PAGE LIMIT**

The Plaintiff, Nikko D’Ambrosio, by and through undersigned counsel, brings this Unopposed Motion for Extension of Time to respond to Defendant Meta Platforms, Inc (“Meta”)’s Motion to Dismiss Second Amended Complaint (Dkt. # 65), Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand’s Motion to Dismiss the Second Amended Complaint (Dkt. # 71), Defendant Abbigail Rajala’s Motion to Dismiss Second Amended Complaint (Dkt. # 75) and Defendants Rodney Rajala and Carol Rajala’s (Dkt. # 76) and Plaintiff additionally moves for leave to file his Responses to Defendants’ Motions to Dismiss in excess of the page limit, in support thereof, states as follows:

1. Meta filed its Motion to Dismiss the Second Amended Complaint on November 22<sup>nd</sup>, 2024 (Dkt. 65) .
2. On November 25, 2024, The Court entered an Order (Dkt. # 67) providing Motion by Defendant Meta Platforms, Inc. to dismiss second amended complaint shall be briefed as follows: Plaintiff's response brief is due by December 16<sup>th</sup>, 2024 and Defendant's reply is due by January 6<sup>th</sup>, 2025.

3. On December 2, 2024, Defendants Spill The Tea, Inc., Paola Sanchez, and Blake Millbrand filed a Motion to Dismiss the Second Amended Complaint (Dkt. # 71).

4. On December 5<sup>th</sup>, 2024, the Court entered an Order (Dkt. # 72) providing Plaintiff to respond to Defendants Spill The Tea, Sanchez, and Millbrand's Motion to Dismiss the First Amended Complaint by January 3, 2025 and Defendants replies are due January 17, 2025.

5. On December 9<sup>th</sup>, 2024, Defendant Abbigail Rajala filed her Motion to Dismiss the Second Amended Complaint (Dkt. # 75). Plaintiff's response is due by January, 10<sup>th</sup>, 2025 and Defendants' reply briefs are due Janaury 24, 2025 (Dkt. #81).

6. Additionally on December 9<sup>th</sup>, 2024, Rodney Rajala and Carol Rajala filed their Motions to Dismiss the Second Amended Complaint (Dkt. # 76), Plaintiff's response is due by January, 10<sup>th</sup>, 2025 and Defendants' reply briefs are due Janaury 24, 2025 (Dkt. #81).

7. Plaintiff seeks an additional 45 days to respond to these four pending Motions to Dismiss.

8. This request is brought in good faith and not for the purposes of delay. No prejudice will result if Plaintiff's request for an extension of time is granted.

9. Plaintiff additionally anticipates that his Response Motions will exceed the page limit and requests permission to file his Motions in excess of the page limit.

10. Plaintiff has conferred with counsel for each Defendant regarding objections to such an extension, and counsel for each Defendant has represented that this Motion is unopposed.

WHEREFORE, the Plaintiff, Nikko D'Ambrosio, respectfully requests this Honorable Court enter an Order:

- a. Granting Plaintiff an additional 45 days to respond to the four pending Motions to Dismiss;
- b. Grant Plaintiff permission to file his Response to Defendants' Motions to Dismiss in excess of the page limit; and
- c. Any such other and further relief this Court deems equitable and just.

Respectfully submitted,

/s/Marc P. Trent

Attorney for Plaintiff

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